Supreme Court, U. S.
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In The

Supreme Court of the United States

October Term, 1978

No. 78-760

HELEN K. TASSOP,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

REPLY OF PETITIONER TO MEMORANDUM OF RESPONDENT

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It is submitted that respondent did not state all the facts in its Memorandum. The following are the facts:

1. The judgment of the Court of Appeals was entered on March 24, 1978.

2. Petitioner and her attorneys were never notified of the said judgment. One attorney of petitioner knew by chance about the judgment on June 16, 1978.

3. On June 22, 1978 petitioner applied for an extension of time to file a writ of certiorari.

4. On July 10, 1978 petitioner applied to the Court of Appeals to recall the mandate and stay its reissuance and for reargument.

5. On July 15 petitioner knew that her petition for an extension of time for a writ of certiorari was refused on July 10, 1978.

6. The Court of Appeals denied the motion of petitioner on August 1, 1978.

7. The petitioner submitted the petition to the Supreme Court of the United States for a writ of certiorari on November 1, 1978.

It is submitted that the time does not run against the petitioner except from August 1, 1978, when her motion for a rehearing was denied by the Court of Appeals, and therefore her petition was made in time and that the objection of respondent should be rejected.

Respectfully submitted,

s/ Gene Crescenzi
Attorney for Petitioner